

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	BANKRUPTCY NO. 20-20542-CMB
SCOTT J. FRANKEL AND)	
SHELLY T. FRANKEL,)	CHAPTER 7
)	
Debtors)	
)	
SCOTT J. FRANKEL AND)	
SHELLY T. FRANKEL,)	
)	
Movants,)	Docket No. _____
v.)	
)	
CHAS M. SLEDD COMPANY,)	
)	
Respondents.)	

**STIPULATION AGREEMENT REGARDING THE MOTION TO DETERMINE
SECURED STATUS**

AND NOW, this _____ day of October 2021, upon consideration of the Motion to Determine Secured Status filed by Scott J. Frankel and Shelly T. Frankel, as husband and wife (“Movants”), the responses thereto, and upon agreement of the parties, the agreement is as follows:

1. Respondents shall have a secured claim in the amount of \$77,500 (the “Secured Claim”).
2. The remaining portion of Respondent, Chas M. Sledd Company’s judgment of \$371,000 shall be treated as a general unsecured claim.
3. Payment terms for the Secured Claim shall be outlined by further agreement of the parties.
4. This Stipulation may only be modified by a revised stipulation filed on the docket in this bankruptcy case. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence.

BY THE COURT:

J.

Agreed to this 4th day of October 2021.

/s/ Michael C. Mazack

Michael C. Mazack, Esq. Pa. I.D. # 205742
501 Smith Drive, Suite 3
Cranberry Township, PA 16066
Phone: (724) 776-8000
Email: mmazack@lynchlaw-group.com

/s/ Keila Estevez

Keila Estevez, Esq. PA I.D. # 324601
kestevez@bernsteinlaw.com
Keri P. Ebeck, Esq. PA I.D. # 91298
kebeck@bernsteinlaw.com
707 Grant Street, Suite 2200 Pittsburgh, PA
15219
Phone:(412)456-8100
Fax: (412) 456-8135